

EOD DEC 01 2000

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

MICHAEL KUCHEJDA
SSN: 318-66-5484

Debtor and Debtor in Possession

Address: 1720 Linden Ave.
Park Ridge, IL 60068

Case No. 99 B 13732

Chapter 11

Bankruptcy Judge
John D. Schwartz

Hearing Date: December 18, 2000
Hearing Time: 10:00 A.M.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
NOV 30 2000
WAYNE E. NELSON, CLERK
PS REP. - PS

**FOURTH AND FINAL APPLICATION FOR COMPENSATION
FOR PROFESSIONAL SERVICES AND FOR REIMBURSEMENT
OF EXPENSES AND MOTION FOR HEARING, INSTANTER**

FORREST L. INGRAM, P.C., ("Applicant") duly appointed attorney for Debtor and Debtor in Possession, hereby makes final application for compensation pursuant to Section 331 of the United States Bankruptcy Code and Rule 2016 and Local Rule 607 and requests that this Honorable Court enter an order allowing compensation for legal services rendered and reimbursement of expenses incurred from July 17, 2000 through December 18, 2000 and in support thereof states as follows:

1. On April 28, 1999, Debtor filed for relief under Chapter 11 under the United States Bankruptcy Code. Debtor remains in possession of its assets.
2. On May 10, 1999, this Court entered an order approving the appointment of Forrest L. Ingram as attorney of record for Debtor and Debtor in Possession. A Copy of the Order is attached, marked **Exhibit A**, and is made part of this pleading.

3. On February 22, 2000 this Court granted applicant's first application for compensation in the sum of \$20,652.00 for fees and \$646.98 for expenses, and authorized counsel to apply the retainer to that award.

4. On February 16, 2000, this Court granted Applicant's Second Application for Compensation in the sum of \$18,818.00 in fees and \$152.23 in costs.

5. On September 18, 2000 this Court granted Applicant's Third Application for Compensation in the sum of \$53,652.50 in fees and \$1,593.00 in costs.

6. The times and chronology of the Applicant's services rendered in the above-entitled proceedings for the period from July 17, 2000 through December 18, 2000 are scheduled in detail to the tenth of an hour and arranged by natures in **Exhibit B**, attached hereto. A copy of Exhibit B has been sent to Debtor with a request for review of the details, and objections, if any. Debtor has not objected to any items listed, to any of the services rendered, nor to any of the fees requested.

7. The times and chronology of the Applicant's services rendered in the above-entitled proceedings for the period from July 17, 2000 through December 18, 2000 are likewise scheduled in detail to the tenth of an hour and arranged by attorneys, and sub-sorted by natures in **Exhibit C**, attached hereto.

8. A summary of costs incurred by Forrest L. Ingram, P.C., is attached hereto as **Exhibit D**, along with sufficient details to support the summary.

9. A brief description of the credentials of each employee of Forrest L. Ingram, P.C. for whom compensation is sought is attached hereto as **Exhibit E**.

10. All services for which compensation is requested were in connection with these bankruptcy proceedings, and were not services in any other matter. All services

performed after the commencement of the above-entitled proceedings were in connection with the performance of duties of the Debtor and Debtor in Possession as prescribed by the Bankruptcy Code or pursuant to orders of this Court.

11. Applicant requests the allowance of payment of compensation during the period July 17, 2000 through December 18, 2000 in the sum of \$9,825.00 for legal services.

12. The services rendered by Applicant were directly related and necessary to the administration and preservation of this estate and are for the time period July 17, 2000 through December 18, 2000.

14. HOURS OF SERVICES PROVIDED BY CATEGORY and ATTORNEY AND CLERK TIMES – Forrest L. Ingram, P.C. provided a total of 46.00 hours of services during this period. The hours, broken down by employee of Forrest L. Ingram, P.C., are summarized in the attached exhibits. They are as follows:

a. DS&P Approximately 14.80 hours (Forrest L. Ingram (FLI), 12.90 hours; Julie Boynton (JB), 1.20 hours; Sherizaan Minwalla (SM), .70 hours) of time and services were rendered related to reviewing Debtor's Disclosure Statement and Plan, including necessary actions to secure the approval of the Disclosure Statement and confirmation of the Plan, reviewing client's financial records, preparing for Court appearances, filing documents with the Court, defending client against objections to Disclosure Statement and Plan, corresponding with the Trustee and with opposing counsel, and corresponding with client. As a result of such activity, Debtor's Second Amended Disclosure Statement was finally approved, and Debtor's Second Amended Plan was confirmed. Further, on the effective date, all payments required to be made to priority tax claimants, post-

petition priority claimants, and general counsel claimants without priority were made and a Report of Disbursements was filed with the Court, along with a motion to close the case.

b. Fee Approximately 15.40 hours (FLI, 4.00 hours; Ryan Haas (RH), 8.90 hours; SM, 2.50 hours) of time and services were rendered related to the preparation of 3rd interim fee application and this final fee application, including necessary review of time sheets and preparation of exhibits, drafting and revising the fee application, filing documents with the Court, and preparing for Court appearances. The third interim fee application was granted on September 18, 2000 and this final application is set for hearing on December 18, 2000.

c. M&I Approximately 1.10 hours (FLI, .80 hours; SM, .30 hours) of time and services were rendered related to the settlement with M&I, including corresponding with Kimberly Weissman and delivering copy of agreed order to Ms. Weissman and to Judge Schwartz. As a result, all matters relating to M&I were settled and M&I was paid in full on its post-petition claim on the effective date.

d. Obj. Approximately 7.00 hours (FLI, 3.80 hours; JB, .90 hours; SM, 2.30 hours) of time and services were rendered related to defending Debtor against claims filed by creditors, including researching, drafting and revising objections to claims, filing objections with the Court, meeting with client regarding settlement options, meeting and corresponding with opposing counsels to discuss settlements, and preparing for Court appearances. As a result of such activity, the Court entered an Agreed Order resolving the claims of the IRS, the IDR, Avatar Properties, and Heller First Capital Corp. All

other objections filed by Debtor were sustained and those claims were disallowed in their entirety.

e. Trste Approximately 1.90 hours (FLI, 1.50 hours; JB, .40 hours) of time and services were rendered related to correspondence with the Trustee, including correspondence regarding Debtor's tax returns, correspondence regarding settlements and confirmation. As a result, the trustee was fully informed of the status of ongoing negotiations and agreements, and assisted the parties in achieving a positive outcome of this case.

f. Tx Approximately 5.80 hours (FLI, 5.30 hours; JB, .50 hours) of time and services were rendered related to Debtor's tax returns and the tax returns of related entities, including reviewing tax documents, corresponding with Jim Newbold at the Illinois Department of Revenue and Greg Stull of the Office of the District Counsel for the Internal Revenue Service, reviewing Debtor's tax returns, and corresponding with client and with George Towne to complete an agreement with the IRS. As a result of such activity, individual and estate tax returns were filed and several of the taxing bodies, and agreements were reached allowing resolution of objections and confirmation of Debtor's Plan.

15. HOURS OF SERVICES PROVIDED BY ATTORNEY AND CLERKS-
the firm provided a total of approximately 46.00 hours of service, broken down by attorney and clerk as follows:

a. Attorney Forrest L. Ingram provided approximately 28.30 hours of services at \$300 per hour including supervising and planning all aspects of the reorganization and

administration of the bankruptcy case, counseling clients, negotiating with opposing parties, and responding to motions.

b. Attorney Julie Boynton provided approximately 3.00 hours of services at \$200 per hour, reviewing reports, drafting motions and corresponding with client and opposing parties.

c. Clerk Ryan Haas provided approximately 8.90 hours of services at \$50 per hour, drafting and revising the 3rd Fee Application and this final fee application, and assisting in preparing and distributing court filings.

d. Clerk Sherizaan Minwalla provided approximately 5.80 hours of services at \$50 per hour, assisting in preparing and distributing court filings and conducting research.

16. Applicant's customary fee includes actual compensation for time and services, fixed overhead, salaries, and unallocable costs.

17. Applicant has expended costs in the amount of \$303.00 which are detailed in **Exhibit D**. These costs include the usual costs involved in bankruptcy administration and include only those costs which were provided for in the Debtor's contract with attorney.

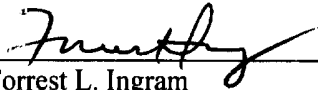
18. This Application and a Notice for Hearing on the Interim Application has been sent to the Debtor, to the U.S. Trustee and to parties entitled to notice. A Notice for Hearing, Instantly, on this application has likewise been sent to the Debtor, U.S. Trustee, all creditors and all parties in interest, along with a summary of all services and expenses provided by Debtor's counsel to Debtor. A certificate of service for the Notice has been filed with the Clerk of the Court.

19. This Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

WHEREFORE, Applicant respectfully requests that this Honorable Court deem service of this motion to be adequate under the circumstances, conduct an appropriate hearing instant on Counsel's application, and allow a reasonable fee to Debtor's counsel in the sum of \$9,825.00 for services for the period July 17, 2000 through December 18, 2000, plus costs in the amount of \$303.00. Applicant requests that the Court authorize and direct Debtor to pay Forrest L. Ingram, P.C. the aggregate sum of \$10,128.00 for this final application, as well as all other sums previously awarded by this Court on prior application of counsel, but not yet paid by Debtor.

Respectfully Submitted,

FORREST L. INGRAM, P.C.



Forrest L. Ingram
Attorney for Debtor

FORREST L. INGRAM, P.C.
79 W. Monroe, Suite 1210
Chicago, IL 60603
312/759-2838
Atty. No. 3120932

EXHIBIT A

**ORDER APPROVING EMPLOYMENT
OF DEBTOR'S COUNSEL**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	
)	Chapter 11
MICHAEL KUCHEJDA.,)	
SSN: 318-66-5484)	99 B 13732
)	
Debtor.)	
)	Honorable Judge John D. Schwartz
Address:)	
1720 S. Linden Avenue)	Hearing set for:
Park Ridge, IL 60068)	May 10, 1999 at 10:00 a.m.

ORDER ALLOWING EMPLOYMENT OF ATTORNEY

This matter came to be heard on the application of Debtor and Debtor in Possession, Michael Kuchejda for authority to employ the attorneys of **FORREST L. INGRAM, P.C.** as his attorneys in these Chapter 11 proceedings. Due notice having been given and the Court being fully advised in these premises,

IT IS HEREBY ORDERED that Debtor and Debtor in Possession are authorized, pursuant to 11 U. § 327(a), to employ Forrest L. Ingram, Julie A. Boynton, John O. Noland, Jr., and Jonathan Rogers of **FORREST L. INGRAM, P.C.** to represent the Debtor and Debtor in Possession in these chapter 11 proceedings upon a general retainer. *all compensation on notice and prior order of court.*

Dated:

BY THE COURT

ENTERED

MAY 10 1999

JOHN D. SCHWARTZ, BANKRUPTCY JUDGE
The Honorable John D. Schwartz
Bankruptcy Judge

This document was prepared by
Forrest L. Ingram, P.C.

EXHIBIT B

**ATTORNEY TIMES
SORTED BY NATURES AND
SUB-SORTED BY DATE**

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

79 W. Monroe, Suite 1210

Chicago, IL 60603-4907

Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
7/25/00	DS&P	Mail notice of extended date for balloting to service list; file certificate of service.	SM	0.70	\$35.00
8/12/00	DS&P	Review work needed for confirmation, spoke with Towne re tax returns requested long ago.	FLI	0.30	\$90.00
8/17/00	DS&P	Meet with client re tax returns and other matters needed for confirmation.	FLI	0.20	\$60.00
8/25/00	DS&P	Spoke with Towne re tax returns for estate, spoke with client re fees, voting, and other matters.	FLI	0.40	\$120.00
9/2/00	DS&P	Spoke with client re meeting today to prepare for confirmation.	FLI	0.10	\$30.00
9/5/00	DS&P	Prepare for hearing, on adequacy of disclosure statement and confirmation of plan; confer with counsel.	FLI	0.50	\$150.00
9/7/00	DS&P	Spoke with Graham re whether Heller will vote in favor of plan.	FLI	0.20	\$60.00
9/7/00	DS&P	Spoke with Collen re whether Avatar agreement will be forthcoming, including a vote in favor of the plan.	FLI	0.10	\$30.00
9/11/00	DS&P	Spoke with Graham re objection to claim and vote re plan.	FLI	0.20	\$60.00
9/14/00	DS&P	Spoke with George Towne re status of hearing on disclosure statement and plan. Call to M. Kuchejda; left message.	FLI	0.30	\$90.00
10/9/00	DS&P	Draft detailed letter to client re actions needed to confirm plan.	FLI	0.50	\$150.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

79 W. Monroe, Suite 1210

Chicago, IL 60603-4907

Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/9/00	DS&P	Draft and fax letters to Graham, Stall, Lukin, Collen, Towne and Gleason re final actions needed for confirmation.	FLI	1.80	\$540.00
10/16/00	DS&P	Review file, votes for plan.	JB	0.50	\$100.00
10/16/00	DS&P	Call Graham re vote.	JB	0.10	\$20.00
10/16/00	DS&P	Call Collen re vote.	JB	0.10	\$20.00
10/16/00	DS&P	Call Graham re vote, he will oppose.	JB	0.20	\$40.00
10/16/00	DS&P	Call client re status.	JB	0.10	\$20.00
10/20/00	DS&P	Call Towne re check to be deposited in trust account.	JB	0.20	\$40.00
10/23/00	DS&P	Meet with JB, re status, review settlement draft from Collen re Avatar.	FLI	0.60	\$180.00
10/24/00	DS&P	Meet with JB, re confirmation, get approval from client and Collen re Avatar settlement, revise tax returns.	FLI	0.30	\$90.00
10/24/00	DS&P	Spoke with Towne re revised estate tax returns, cashiers check for plan, and other matters.	FLI	0.20	\$60.00
10/24/00	DS&P	Spoke with client re revised tax returns, Heller And Avatar.	FLI	0.20	\$60.00

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/25/00	DS&P	Conferences with Gleason, Graham, court appearance re confirmation. Get continuation date.	FLI	0.40	\$120.00
11/2/00	DS&P	Organize file, draft summary of objections sustained, prepare for confirmation.	FLI	0.50	\$150.00
11/6/00	DS&P	Meet with client to prepare for confirmation.	FLI	0.50	\$150.00
11/6/00	DS&P	Spoke with Greg Stull re treatment of IRS in chapter 11 plan.	FLI	0.30	\$90.00
11/6/00	DS&P	Draft Exhibit A to Plan--modification of 2nd Amended Plan--to be attached to order of confirmation.	FLI	0.60	\$180.00
11/7/00	DS&P	Draft new version of Exhibit A. Spoke with Peter Spier re settlement with Avatar--he will give deed to lots 57 and 58 and release of indebtedness.	FLI	0.40	\$120.00
11/8/00	DS&P	Court appearance re final approval of disclosure statement and confirmation of second amended plan. Conferences with Gleason, Graham, Spier, Stull and Newbold.	FLI	1.00	\$300.00
11/8/00	DS&P	Review message from Graham. Revise Agreed Order with Heller. Revise agreed orders with IRS and IDR.	FLI	0.70	\$210.00
11/8/00	DS&P	Spoke with Peter Spier and Greg Stull to prepare for hearing on disclosure statement and plan.	FLI	0.40	\$120.00
11/9/00	DS&P	Spoke with Peter Spier. Fax and mail letter to him with copy of agreed order.	FLI	0.20	\$60.00
11/9/00	DS&P	Draft letter to client. Direct LQ to made copies of documents to convey to client re confirmation and post confirmation tasks.	FLI	0.50	\$150.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
12/18/00	DS&P	Prospective: prepare distribution of funds according to plan and report of plan payments, motion to close case. Court appearance re same.	FLI	1.50	\$450.00
Time by Natures				14.80	
Fee by Natures					\$4145.00
7/27/00	Fee	Edit time sheets for fee petition.	FLI	0.70	\$210.00
8/3/00	Fee	Prepare time sheets as exhibits; direct RH to draft third interim fee application.	FLI	0.40	\$120.00
8/4/00	Fee	Started drafting fee application (third) and related documents.	RH	1.00	\$50.00
8/9/00	Fee	Continued drafting 3rd fee application.	RH	0.30	\$15.00
8/17/00	Fee	Finished 1st draft of 3rd interim fee application., gave to FLI for review.	RH	2.30	\$115.00
8/17/00	Fee	Review and revise 3rd fee application for fees.	FLI	0.50	\$150.00
8/18/00	Fee	Revisions to 3rd fee application, typed notice of motion and minute order, sent summary of fees to client, print all documents for FLI .	RH	3.50	\$175.00
8/19/00	Fee	Review and approve 3rd interim fee application.	FLI	0.30	\$90.00
8/21/00	Fee	Complete fee application, edit, copy, file, and serve.	SM	2.00	\$100.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
8/22/00	Fee	Filed notice of hearing re 3rd fee application.	RH	0.30	\$15.00
9/12/00	Fee	Prepare for court and court appearance re 3rd interim fee application, direct JB to revise order.	FLI	0.50	\$150.00
9/15/00	Fee	Edit order for Judge Schwartz, deliver to chambers.	SM	0.50	\$25.00
11/13/00	Fee	Edit time sheets. Discuss prospective fee application with client. Give him copy of time sheets.	FLI	1.00	\$300.00
11/13/00	Fee	Direct RH to prepare 4th fee application.	FLI	0.10	\$30.00
11/14/00	Fee	Prepare 4th fee application, notices, order.	RH	1.50	\$75.00
12/18/00	Fee	Prospective: review and revise fee application; court appearance for entry of order allowing fees.	FLI	0.50	\$150.00

Time by Natures**15.40****Fee by Natures****\$1770.00**

7/26/00	M&I	Call to Weissman, final agreement on text of settlement, draft cover letter, messenger with 4 originals of agreement.	FLI	0.80	\$240.00
7/26/00	M&I	Deliver copy of agreed order to Kimberly Weissman to sign and bring to Judge Schwartz.	SM	0.30	\$15.00

Time by Natures**1.10****Fee by Natures****\$255.00**

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
7/17/00	Obj	Revise objection to Heller claim; copy, file, and serve.	SM	1.00	\$50.00
8/3/00	Obj	Spoke with Brian Graham re objection to Heller's claim and confirmation of plan.	FLI	0.30	\$90.00
9/11/00	Obj	Spoke with Collen re whether Avatar agreement is moving forward.	FLI	0.20	\$60.00
9/12/00	Obj	Spoke with Collen re agreed order brought to court by associate.	FLI	0.20	\$60.00
9/12/00	Obj	Draft certificates of service for 7 orders allowing objections to claims, mail orders and objections and file certificate of service.	SM	1.30	\$65.00
10/5/00	Obj	Spoke with client re settlement with Avatar.	FLI	0.20	\$60.00
10/20/00	Obj	Review stipulation, discuss with FLI.	JB	0.20	\$40.00
10/20/00	Obj	Call Collen re Avatar.	JB	0.20	\$40.00
10/23/00	Obj	Call from Collen, revised stipulation.	JB	0.20	\$40.00
10/23/00	Obj	Call from Lukin re objection to IDR claim.	JB	0.10	\$20.00
10/24/00	Obj	Call from Collen re getting Elizabeth to sign off on stipulation.	JB	0.20	\$40.00

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/25/00	Obj	Meet with Newbold re proof of claim and client's objection, also re amended 1041-x form.	FLI	0.40	\$120.00
10/25/00	Obj	Spoke with Collen re agreement with client re return of property to Avatar.	FLI	0.20	\$60.00
10/30/00	Obj	Spoke with Greg Stull re power of attorney for Towne to discuss estate and individual returns, agreement re proof of claim, and settlement of claim.	FLI	0.30	\$90.00
11/2/00	Obj	Review file, draft letter to Collen, fax.	FLI	0.30	\$90.00
11/2/00	Obj	Refax letter to Collen.	FLI	0.10	\$30.00
11/6/00	Obj	Draft letter to Brian Graham; fax to him with copies of Exhibit A and other documents.	FLI	0.60	\$180.00
11/6/00	Obj	Call to John Collen re Agreed Order with Avatar. Letter to Collen re same. Fax and messenger to Collen.	FLI	0.40	\$120.00
11/7/00	Obj	Spoke with George Towne re final revised tax returns, trustee's fees, and settlement with IRS.	FLI	0.20	\$60.00
11/7/00	Obj	Spoke with Brian Graham re settlement with Heller. Draft agreed order re objection to claim. Draft letter to Brian. Fax with Agreed Order and Exhibit A.	FLI	0.40	\$120.00
Time by Natures				7.00	
Fee by Natures					\$1435.00
9/6/00	Trste	Fax letter to Gleason with 1999 federal estate tax returns.	FLI	0.20	\$60.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
9/6/00	Trste	Draft and fax letter to Gleason, state tax returns.	FLI	0.20	\$60.00
9/11/00	Trste	Draft and fax letter to Gleason re update on hearing.	FLI	0.20	\$60.00
10/20/00	Trste	Call trustee re confirmation.	JB	0.10	\$20.00
10/23/00	Trste	Call Gleason re extension of time.	JB	0.30	\$60.00
11/6/00	Trste	Draft letter to Katy Gleason; fax to her with copies of Exhibit A, settlement with Avatar, and other documents.	FLI	0.70	\$210.00
11/7/00	Trste	Draft and fax letter to K. Gleason re status of settlements and readiness to confirm plan.	FLI	0.20	\$60.00

Time by Natures**1.90****Fee by Natures****\$530.00**

7/19/00	Tx	Spoke with Rick Fogel re closing statement on Kedzie sale.	FLI	0.20	\$60.00
8/2/00	Tx	Spoke with George Towne re estate returns for 1999 and other matters.	FLI	0.20	\$60.00
9/2/00	Tx	Spoke with Towne re IRS claim against estate.	FLI	0.10	\$30.00
9/2/00	Tx	Spoke with client re tax returns, confirmation.	FLI	0.20	\$60.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
9/2/00	Tx	Spoke with Towne re estate returns.	FLI	0.20	\$60.00
9/5/00	Tx	Spoke with Towne re tax returns to be sent to me by overnight mail.	FLI	0.20	\$60.00
9/6/00	Tx	Review and file tax returns at IRS and IDR.	FLI	0.60	\$180.00
9/6/00	Tx	Draft and fax letter to Newbold, copies of state tax returns.	FLI	0.20	\$60.00
9/6/00	Tx	Spoke with Greg re tax returns, draft letter to him, fax with returns.	FLI	0.40	\$120.00
9/12/00	Tx	Spoke with Greg Stull re tax returns, continuing the confirmation hearing, and other matters.	FLI	0.20	\$60.00
9/25/00	Tx	Spoke with Greg re need to get Chemigraph returns and amend tax returns for debtor's estate.	FLI	0.20	\$60.00
10/23/00	Tx	Review estate tax returns, error noted, losses not recorded, Amend.	JB	0.30	\$60.00
10/23/00	Tx	Call from Towne re revisions needed.	JB	0.20	\$40.00
10/25/00	Tx	Meet with Towne, review tax returns.	FLI	0.30	\$90.00
10/26/00	Tx	Meet with client to review and sign estate tax returns, direct LQ to file and serve IDR returns on Newbold.	FLI	1.00	\$300.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/30/00	Tx	Draft fax letter to Greg Stull, fax with amended returns.	FLI	0.30	\$90.00
10/30/00	Tx	Draft and fax letter to Greg Stull, fax with amended returns, spoke with Eunice Johnson re filed returns.	FLI	0.50	\$150.00
11/2/00	Tx	Spoke with Towne re rescheduling meeting with Greg Stull re tax returns.	FLI	0.20	\$60.00
11/3/00	Tx	Conference call with Greg, Towne re calculating estate taxes and completing agreement with IRS.	FLI	0.30	\$90.00

Time by Natures**5.80****Fee by Natures****\$1690.00****Total Time****46.00****Total Fee****\$9825.00**

EXHIBIT C

**ATTORNEY TIMES
SORTED BY ATTORNEYS
AND
SUB-SORTED BY NATURES
AND BY DATE**

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

79 W. Monroe, Suite 1210

Chicago, IL 60603-4907

Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
8/12/00	DS&P	Review work needed for confirmation, spoke with Towne re tax returns requested long ago.	FLI	0.30	\$90.00
8/17/00	DS&P	Meet with client re tax returns and other matters needed for confirmation.	FLI	0.20	\$60.00
8/25/00	DS&P	Spoke with Towne re tax returns for estate, spoke with client re fees, voting, and other matters.	FLI	0.40	\$120.00
9/2/00	DS&P	Spoke with client re meeting today to prepare for confirmation.	FLI	0.10	\$30.00
9/5/00	DS&P	Prepare for hearing, on adequacy of disclosure statement and confirmation of plan; confer with counsel.	FLI	0.50	\$150.00
9/7/00	DS&P	Spoke with Collen re whether Avatar agreement will be forthcoming, including a vote in favor of the plan.	FLI	0.10	\$30.00
9/7/00	DS&P	Spoke with Graham re whether Heller will vote in favor of plan.	FLI	0.20	\$60.00
9/11/00	DS&P	Spoke with Graham re objection to claim and vote re plan.	FLI	0.20	\$60.00
9/14/00	DS&P	Spoke with George Towne re status of hearing on disclosure statement and plan. Call to M. Kuchejda; left message.	FLI	0.30	\$90.00
10/9/00	DS&P	Draft and fax letters to Graham, Stall, Lukin, Collen, Towne and Gleason re final actions needed for confirmation.	FLI	1.80	\$540.00
10/9/00	DS&P	Draft detailed letter to client re actions needed to confirm plan.	FLI	0.50	\$150.00

FORREST L. INGRAM, P.C.*Attorneys and Counsellors*

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Chicago, IL 60603-4907

Kuchejda, Michael

<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/23/00	DS&P	Meet with JB, re status, review settlement draft from Collen re Avatar.	FLI	0.60	\$180.00
10/24/00	DS&P	Spoke with client re revised tax returns, Heller And Avatar.	FLI	0.20	\$60.00
10/24/00	DS&P	Spoke with Towne re revised estate tax returns, cashiers check for plan, and other matters.	FLI	0.20	\$60.00
10/24/00	DS&P	Meet with JB, re confirmation, get approval from client and Collen re Avatar settlement, revise tax returns.	FLI	0.30	\$90.00
10/25/00	DS&P	Conferences with Gleason, Graham, court appearance re confirmation. Get continuation date.	FLI	0.40	\$120.00
11/2/00	DS&P	Organize file, draft summary of objections sustained, prepare for confirmation.	FLI	0.50	\$150.00
11/6/00	DS&P	Draft Exhibit A to Plan--modification of 2nd Amended Plan--to be attached to order of confirmation.	FLI	0.60	\$180.00
11/6/00	DS&P	Spoke with Greg Stull re treatment of IRS in chapter 11 plan.	FLI	0.30	\$90.00
11/6/00	DS&P	Meet with client to prepare for confirmation.	FLI	0.50	\$150.00
11/7/00	DS&P	Draft new version of Exhibit A. Spoke with Peter Spier re settlement with Avatar--he will give deed to lots 57 and 58 and release of indebtedness.	FLI	0.40	\$120.00
11/8/00	DS&P	Spoke with Peter Spier and Greg Stull to prepare for hearing on disclosure statement and plan.	FLI	0.40	\$120.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
11/8/00	DS&P	Review message from Graham. Revise Agreed Order with Heller. Revise agreed orders with IRS and IDR.	FLI	0.70	\$210.00
11/8/00	DS&P	Court appearance re final approval of disclosure statement and confirmation of second amended plan. Conferences with Gleason, Graham, Spier, Stull and Newbold.	FLI	1.00	\$300.00
11/9/00	DS&P	Draft letter to client. Direct LQ to made copies of documents to convey to client re confirmation and post confirmation tasks.	FLI	0.50	\$150.00
11/9/00	DS&P	Spoke with Peter Spier. Fax and mail letter to him with copy of agreed order.	FLI	0.20	\$60.00
12/18/00	DS&P	Prospective: prepare distribution of funds according to plan and report of plan payments, motion to close case. Court appearance re same.	FLI	1.50	\$450.00
Time by Natures				12.90	
Fee by Natures					\$3870.00
7/27/00	Fee	Edit time sheets for fee petition.	FLI	0.70	\$210.00
8/3/00	Fee	Prepare time sheets as exhibits; direct RH to draft third interim fee application.	FLI	0.40	\$120.00
8/17/00	Fee	Review and revise 3rd fee application for fees.	FLI	0.50	\$150.00
8/19/00	Fee	Review and approve 3rd interim fee application.	FLI	0.30	\$90.00
9/12/00	Fee	Prepare for court and court appearance re 3rd interim fee application, direct JB to revise order.	FLI	0.50	\$150.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
11/13/00	Fee	Direct RH to prepare 4th fee application.	FLI	0.10	\$30.00
11/13/00	Fee	Edit time sheets. Discuss prospective fee application with client. Give him copy of time sheets.	FLI	1.00	\$300.00
12/18/00	Fee	Prospective: review and revise fee application; court appearance for entry of order allowing fees.	FLI	0.50	\$150.00
Time by Natures				4.00	
Fee by Natures					\$1200.00
7/26/00	M&I	Call to Weissman, final agreement on text of settlement, draft cover letter, messenger with 4 originals of agreement.	FLI	0.80	\$240.00
Time by Natures				0.80	
Fee by Natures					\$240.00
8/3/00	Obj	Spoke with Brian Graham re objection to Heller's claim and confirmation of plan.	FLI	0.30	\$90.00
9/11/00	Obj	Spoke with Collen re whether Avatar agreement is moving forward.	FLI	0.20	\$60.00
9/12/00	Obj	Spoke with Collen re agreed order brought to court by associate.	FLI	0.20	\$60.00
10/5/00	Obj	Spoke with client re settlement with Avatar.	FLI	0.20	\$60.00
10/25/00	Obj	Meet with Newbold re proof of claim and client's objection, also re amended 1041-x form.	FLI	0.40	\$120.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
10/25/00	Obj	Spoke with Collen re agreement with client re return of property to Avatar.	FLI	0.20	\$60.00
10/30/00	Obj	Spoke with Greg Stull re power of attorney for Towne to discuss estate and individual returns, agreement re proof of claim, and settlement of claim.	FLI	0.30	\$90.00
11/2/00	Obj	Refax letter to Collen.	FLI	0.10	\$30.00
11/2/00	Obj	Review file, draft letter to Collen, fax.	FLI	0.30	\$90.00
11/6/00	Obj	Call to John Collen re Agreed Order with Avatar. Letter to Collen re same. Fax and messenger to Collen.	FLI	0.40	\$120.00
11/6/00	Obj	Draft letter to Brian Graham; fax to him with copies of Exhibit A and other documents.	FLI	0.60	\$180.00
11/7/00	Obj	Spoke with George Towne re final revised tax returns, trustee's fees, and settlement with IRS.	FLI	0.20	\$60.00
11/7/00	Obj	Spoke with Brian Graham re settlement with Heller. Draft agreed order re objection to claim. Draft letter to Brian. Fax with Agreed Order and Exhibit A.	FLI	0.40	\$120.00

Time by Natures**3.80****Fee by Natures****\$1140.00**

9/6/00	Trste	Fax letter to Gleason with 1999 federal estate tax returns.	FLI	0.20	\$60.00
9/6/00	Trste	Draft and fax letter to Gleason, state tax returns.	FLI	0.20	\$60.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
9/11/00	Trste	Draft and fax letter to Gleason re update on hearing.	FLI	0.20	\$60.00
11/6/00	Trste	Draft letter to Katy Gleason; fax to her with copies of Exhibit A, settlement with Avatar, and other documents.	FLI	0.70	\$210.00
11/7/00	Trste	Draft and fax letter to K. Gleason re status of settlements and readiness to confirm plan.	FLI	0.20	\$60.00
Time by Natures				1.50	
Fee by Natures					\$450.00
7/19/00	Tx	Spoke with Rick Fogel re closing statement on Kedzie sale.	FLI	0.20	\$60.00
8/2/00	Tx	Spoke with George Towne re estate returns for 1999 and other matters.	FLI	0.20	\$60.00
9/2/00	Tx	Spoke with Towne re IRS claim against estate.	FLI	0.10	\$30.00
9/2/00	Tx	Spoke with Towne re estate returns.	FLI	0.20	\$60.00
9/2/00	Tx	Spoke with client re tax returns, confirmation.	FLI	0.20	\$60.00
9/5/00	Tx	Spoke with Towne re tax returns to be sent to me by overnight mail.	FLI	0.20	\$60.00
9/6/00	Tx	Review and file tax returns at IRS and IDR.	FLI	0.60	\$180.00

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9/6/00	Tx	Spoke with Greg re tax returns, draft letter to him, fax with returns.	FLI	0.40	\$120.00
9/6/00	Tx	Draft and fax letter to Newbold, copies of state tax returns.	FLI	0.20	\$60.00
9/12/00	Tx	Spoke with Greg Stull re tax returns, continuing the confirmation hearing, and other matters.	FLI	0.20	\$60.00
9/25/00	Tx	Spoke with Greg re need to get Chemigraph returns and amend tax returns for debtor's estate.	FLI	0.20	\$60.00
10/25/00	Tx	Meet with Towne, review tax returns.	FLI	0.30	\$90.00
10/26/00	Tx	Meet with client to review and sign estate tax returns, direct LQ to file and serve IDR returns on Newbold.	FLI	1.00	\$300.00
10/30/00	Tx	Draft fax letter to Greg Stull, fax with amended returns.	FLI	0.30	\$90.00
10/30/00	Tx	Draft and fax letter to Greg Stull, fax with amended returns, spoke with Eunice Johnson re filed returns.	FLI	0.50	\$150.00
11/2/00	Tx	Spoke with Towne re rescheduling meeting with Greg Stull re tax returns.	FLI	0.20	\$60.00
11/3/00	Tx	Conference call with Greg, Towne re calculating estate taxes and completing agreement with IRS.	FLI	0.30	\$90.00

Time by Natures**5.30****Fee by Natures****\$1590.00**

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10/16/00	DS&P	Call Graham re vote, he will oppose.	JB	0.20	\$40.00
10/16/00	DS&P	Call Collen re vote.	JB	0.10	\$20.00
10/16/00	DS&P	Review file, votes for plan.	JB	0.50	\$100.00
10/16/00	DS&P	Call client re status.	JB	0.10	\$20.00
10/16/00	DS&P	Call Graham re vote.	JB	0.10	\$20.00
10/20/00	DS&P	Call Towne re check to be deposited in trust account.	JB	0.20	\$40.00
				Time by Natures	1.20
				Fee by Natures	\$240.00
10/20/00	Obj	Review stipulation, discuss with FLI.	JB	0.20	\$40.00
10/20/00	Obj	Call Collen re Avatar.	JB	0.20	\$40.00
10/23/00	Obj	Call from Lukin re objection to IDR claim.	JB	0.10	\$20.00
10/23/00	Obj	Call from Collen, revised stipulation.	JB	0.20	\$40.00

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10/24/00	Obj	Call from Collen re getting Elizabeth to sign off on stipulation.	JB	0.20	\$40.00
Time by Natures				0.90	
Fee by Natures					\$180.00
10/20/00	Trste	Call trustee re confirmation.	JB	0.10	\$20.00
10/23/00	Trste	Call Gleason re extension of time.	JB	0.30	\$60.00
Time by Natures				0.40	
Fee by Natures					\$80.00
10/23/00	Tx	Call from Towne re revisions needed.	JB	0.20	\$40.00
10/23/00	Tx	Review estate tax returns, error noted, losses not recorded, Amend.	JB	0.30	\$60.00
Time by Natures				0.50	
Fee by Natures					\$100.00
8/4/00	Fee	Started drafting fee application (third) and related documents.	RH	1.00	\$50.00
8/9/00	Fee	Continued drafting 3rd fee application.	RH	0.30	\$15.00
8/17/00	Fee	Finished 1st draft of 3rd interim fee application., gave to FLI for review.	RH	2.30	\$115.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
8/18/00	Fee	Revisions to 3rd fee application, typed notice of motion and minute order, sent summary of fees to client, print all documents for FLI .	RH	3.50	\$175.00
8/22/00	Fee	Filed notice of hearing re 3rd fee application.	RH	0.30	\$15.00
11/14/00	Fee	Prepare 4th fee application, notices, order.	RH	1.50	\$75.00
Time by Natures				8.90	
Fee by Natures					\$445.00
7/25/00	DS&P	Mail notice of extended date for balloting to service list; file certificate of service.	SM	0.70	\$35.00
Time by Natures				0.70	
Fee by Natures					\$35.00
8/21/00	Fee	Complete fee application, edit, copy, file, and serve.	SM	2.00	\$100.00
9/15/00	Fee	Edit order for Judge Schwartz, deliver to chambers.	SM	0.50	\$25.00
Time by Natures				2.50	
Fee by Natures					\$125.00
7/26/00	M&I	Deliver copy of agreed order to Kimberly Weissman to sign and bring to Judge Schwartz.	SM	0.30	\$15.00
Time by Natures				0.30	
Fee by Natures					\$15.00

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<u>Date</u>	<u>Nature</u>	<u>Item</u>	<u>Atty</u>	<u>Time</u>	<u>Fee</u>
7/17/00	Obj	Revise objection to Heller claim; copy, file, and serve.	SM	1.00	\$50.00
9/12/00	Obj	Draft certificates of service for 7 orders allowing objections to claims, mail orders and objections and file certificate of service.	SM	1.30	\$65.00
Time by Natures				2.30	
Fee by Natures					\$115.00
Total Time				46.00	
Total Fee					\$9825.00

EXHIBIT D
SUMMARY OF COSTS

Michael Kuchjeda
Expenses for 4th Fee Petition
November 21, 2000

Summary

Photocopying Cost:	\$288.20
Facsimile Cost:	\$11.50
Postage Cost:	\$3.30
Total	\$303.00

Photocopying cost .20 per page

Date	Matter	Pages	Copies	Total Copies	.20 per page
8/21/00	3 rd Fee Application	88	12	1056	211.20
8/21/00	Notice of motion for 3 rd Fee App.	4	25	100	20.00
8/21/00	Notice of hearing for 3 rd Fee App.	2	25	50	10.00
9/06/00	Federal tax returns - estate	11	3	33	6.60
9/12/00	Orders re: objections to claims	7	3	21	4.20
9/25/00	Tax returns	17	1	17	3.40
10/07/00	Agreed Order	2	4	8	1.60
10/07/00	Plan	21	4	84	16.80
10/08/00	Agreed Order	3	5	15	3.00
10/08/00	Agreed Order	2	5	10	2.00
10/08/00	Agreed Order	2	5	10	2.00
11/09/00	Avatar Agreed Order	5	5	25	5.00
11/18/00	Report of Distribution	2	6	12	2.40

Facsimile cost .50 per page

Date	Matter	Total Faxes	.50 per page
11/06/00	Disclosure statement & Plan to K. Gleason	10	5.00
11/07/00	Agreed Order – Heller to K. Gleason	3	1.50
11/07/00	Agreed Order – Heller to B. Graham	3	1.50
11/07/00	Order re: Plan to Peter Speir	3	1.50
11/18/00	Letter re: quitclaim deed to Andrew Allen	2	1.00
11/18/00	Letter re: quitclaim deed and taxes to G. Towne	2	1.00

Postage Cost

Date	Matter	No. of Env.	Cost per Env.	Total Postage Cost
9/12/00	Orders re: objections to claims	7	.33	2.31
9/25/00	To IRS/Local Counsel	1	.99	.99

EXHIBIT E

EMPLOYEES OF FORREST L. INGRAM, P.C.

ATTORNEYS OF FORREST L. INGRAM, P.C.

Forrest L. Ingram, Attorney. BA Spring Hill College, 1962; MA, Spring Hill College; 1963; MA University of Southern California, 1965; Ph.D., University of Southern California, 1967; BD, Gemeinte Universiteit te Amsterdam, 1970; Associate Professor, Loyola University New Orleans, 1969-73; Editor, Department of English, Moorhead State University, Moorhead, MN, 1974-76; Professor, Chairman Department of English and Communicative Arts, Roosevelt University, Chicago, 1976-84; Author/Editor: various books, articles, reviews; JD, IIT-Chicago Kent College of Law, 1981. Law Review; Dean's List; Bar & Gavel Award. Admitted to practice: Supreme Court of the State of Illinois, 1981; U.S. District Court, Northern District of Illinois, 1981; Seventh Circuit Court of Appeals, 1989; United States Supreme Court, 1995. ISBA, CBA. Member Bankruptcy and Reorganization Committee.

Julie A. Boynton, Attorney. BS, Western Illinois University, 1974; Dean's List, Illinois State Teacher's Scholarship, President WIU Chapter National Honor Society Psychology; teaching assistant; MS Southern Illinois University, 1981; JD, John Marshall School of Law, 1994. Admitted to practice: Supreme Court of the State of Illinois, 1994; U.S. District Court, Northern District of Illinois, 1994, Seventh Circuit Court of Appeals, 1996. ABA, ISBA, CBA, Member Bankruptcy and Reorganization Committee.